

HEFNER STARK & MAROIS, LLP
Thomas P. Griffin Jr., Esq. (SBN 155133)
tgriffin@hsmlaw.com
2150 River Plaza Drive, Suite 450
Sacramento, CA 95833
Telephone: 916.925.6620
Facsimile: 916.925.1127

**ABRAMS, FENSTERMAN, FENSTERMAN,
EISMAN, FORMATO, FERRARA,
WOLF & CARONE, LLP**
Seth L. Berman, Esq. (*pro hac vice admission to be requested*)
sberman@abramslaw.com
3 Dakota Drive, Suite 300
Lake Success, NY 11042
Telephone: 516.328.2300
Facsimile: 516.328.6638

Attorneys for Plaintiff COLONIZE MEDIA, INC.

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA**

COLONIZE MEDIA, INC.,)	Case No. 1:20-cv-01053-DAD-SAB
)	
Plaintiff,)	PLAINTIFF COLONIZE MEDIA,
)	INC.'S FIRST SET OF
v.)	INTERROGATORIES TO
)	TRIWOLF MEDIA, LLC AND
TATE A. PALMER, TRIWOLF)	TANGO MULTI MEDIA
MEDIA, LLC and TANGO MULTI)	PRODUCTIONS, LLC
MEDIA PRODUCTIONS, LLC,)	
)	
Defendants.)	Complaint Filed: July 29, 2020

Pursuant to the provisions of Rule 33 of the Federal Rules of Civil Procedure, Plaintiff Colonize Media, Inc. ("Colonize") requests that Defendants Triwolf Media, LLC and Tango Multi Media Productions, LLC (collectively, "Defendants") answer the following interrogatories within thirty (30) days of the service hereof.

///

DEFINITION

1
2 1. "You" means and refers collectively to Defendants Triwolff Media, LLC
3 and Tango Multi Media Productions, LLC.

INSTRUCTIONS

4
5 1. Where knowledge, information, or documents are requested, such request
6 encompasses knowledge, information or documents in your possession, custody or
7 control, or in the possession, custody or control of your staff, agents, employees,
8 representatives and, unless privileged, attorneys, or any other person who has
9 possession, custody or control of your proprietary knowledge, information or
10 documents.

11 2. Pursuant to Fed. R. Civ. P. 26(e), you are under a duty seasonably to
12 amend any answer to these interrogatories for which you learn that the answer is in
13 some material respect incomplete or incorrect and if the additional or corrective
14 information has not otherwise been made known to us during the discovery process or
15 in writing.

16 3. For any interrogatory or part of an interrogatory which you refuse to
17 answer under a claim of privilege, submit a sworn or certified statement from your
18 counsel or one of your employees in which you identify the nature of the information
19 withheld; specify the grounds of the claimed privilege and the paragraph of these
20 interrogatories to which the information is responsive; and identify each person to
21 whom the information, or any party thereof, has been disclosed.

22 4. Answer each interrogatory fully. If you object to any interrogatory, state
23 the reasons for objection and answer to the extent the interrogatory is not
24 objectionable. If you are unable to answer an interrogatory fully, submit as much
25 information as is available, explain why your answer is incomplete, and identify or
26 describe all other sources of more complete or accurate information.

27 ///

INTERROGATORIES

INTERROGATORY NO. 1:

Identify the current residential address that you have for Tate A. Palmer.

INTERROGATORY NO. 2:

Identify all prior residential addresses that you have for Tate A. Palmer

Dated: November 20, 2020

HEFNER STARK & MAROIS, LLP

By: 

Thomas P. Griffin, Jr., Esq.
Attorneys for Plaintiff
Colonize Media, Inc.

1 Court: United States District Court, Eastern District of California
2 Case No.: 1:20-cv-01053-DAD-SAB
3 Case Name: Colonize Media, Inc. v. Tate A. Palmer, Triwolf Media, LLC and Tango
4 Multi Media Productions, LLC

5 **PROOF OF SERVICE**

6 I am a citizen of the United States, employed in the city and county of
7 Sacramento. My business address is Hefner, Stark & Marois, LLP, 2150 River Plaza
8 Drive, Suite 450, Sacramento, California 95833-3883. I am over the age of 18 years
9 and not a party to the above-entitled action. I am readily familiar with my employer's
10 practices for collection and processing of correspondence for mailing with the United
11 States Postal Service.

12 On November 20, 2020, I served the following documents:

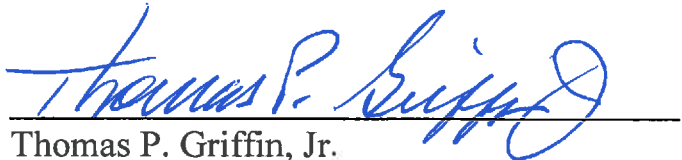
13 **PLAINTIFF COLONIZE MEDIA, INC.'S FIRST SET OF**
14 **INTERROGATORIES TO TRIWOLF MEDIA, LLC AND TANGO MULTI**
15 **MEDIA PRODUCTIONS, LLC**

16 X By E-Mail or Electronic Transmission: I caused the documents to be sent to the
17 persons at the e-mail addresses listed below. I did not receive, within a reasonable time
18 after the transmission, any electronic message or other indication that the transmission
19 was unsuccessful.

20 Thomas K. Richard
21 Justin Trauben
22 Singh, Singh & Trauben, LLP
23 400 South Beverly Drive, Suite 240
24 Beverly Hills, CA 90212
25 trichards@singhtraubenlaw.com
26 jtrauben@singhtraubenlaw.com

Attorneys for Defendants Triwolf Media,
LLC and Tango Multi Media Productions,
LLC

27 I declare under penalty of perjury under the laws of the State of California that
28 the foregoing is true and correct and that this document was executed on November 20,
2020, at Sacramento, California.

29 
Thomas P. Griffin, Jr.